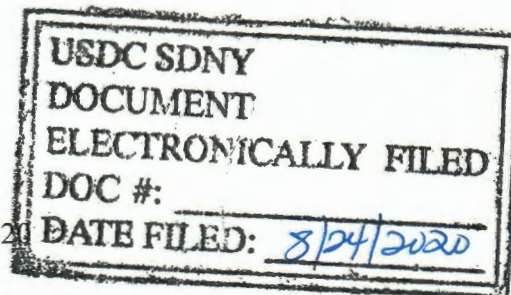


LAW OFFICES OF
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August 24, 2020



Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States v. Juan Rodriguez and Jose Martinez
96 Cr. 959-1 (SHS), 18 CV 1072 (SHS)

Dear Judge Stein:

Defense Counsel for the Defendants jointly and respectfully submit this letter motion seeking to modify the briefing schedule "so ordered" on July 16, 2020 (Doc. 152), to extend all filing dates for all parties by seven business days. The Government consents to the relief sought.

Last week, with the Government's assistance, we located the transcripts required to evaluate the Davis claims made in the pending 2255 motions. We also located the jury verdict form signed by the foreperson. While the recent power outages impacted and delayed defense counsels' efforts to coordinate, we are now actively working on a joint submission with the benefit of required documents. We need additional time to draft our submission and share our views with our respective incarcerated clients.

For these reasons, we request that the schedules be modified as follows:

1. Defendants' motions shall be filed on or before September 8, 2020;
2. The Government will respond on or before October 5, 2020;
3. Defendants shall file any reply on or before October 13, 2020.

Having obtained the documents we need, we do not foresee the need for any additional adjournments.

Respectfully,

A handwritten signature in black ink, appearing to read "Scott B. Tulman".

Scott B. Tulman

SBT:ss

cc: All Counsel (by email)

Application granted.

**Dated: New York, New York
August 24, 2020**

SO ORDERED:

A handwritten signature in blue ink, appearing to read "Sidney H. Stein".
Sidney H. Stein, U.S.D.J.